



City of Jackson, MS

Wastewater and Drinking Water

(Internal Deliberative: Do not release)

City of Jackson, MS - *Overview*

- ▶ **Wastewater Consent Decree Status Update**
- ▶ **Drinking Water Enforcement Status Update**
- ▶ **Drinking Water Enforcement Options**
- ▶ **Financial Status Update**

City of Jackson, MS - *Wastewater*

CWA Enforcement Consent Decree - entered March 2013

► Requirements

- Assess and rehabilitate the sanitary sewer system and Savanna Street WWTP
- Develop and implement Capacity, Management, Operations and Maintenance (CMOM) Programs
 - Fats, Oils, and Grease Management for Food Service Establishments ☒ *Implemented*
 - Sewer Overflow Response and Repairs Plan (SORP) ☐ *Partially implemented*
 - Other CMOM Programs ☒ *Not Implemented*
- City will not complete all CD requirements within the compliance dates

► Current Status

- City invested in a new billing and metering system - full implementation January 2023
- City approved a 20% rate hike for water and sewer rates in December 2021
- EPA reviewing City's Revenue Stabilization Plan, Long-Term Financial Model (for ww system), and CD modification language
- (b)(5) (b)(7)

City of Jackson, MS - *Wastewater*

CWA Enforcement Consent Decree

► Work with City has focused on

- Increased EPA oversight and technical support
- Increasing City's response capacity to protect human health from sanitary sewer overflows
- Assisting the City with funding sources
- CD modification negotiations
- Joint Status Updates to the Court

► Challenges

- Routine bypasses at the WWTP from significant Inflow and Infiltration (I&I) throughout system
- Constant line breaks causing sanitary sewer overflows and backups
- Revenue shortfalls from prior fraud, billing/collections problems, failure to raise rates
- Staff shortages (at 40%) impacting operations and maintenance of WWTP and sewer system
- City's proposed compliance deadline for CD modification is 2060

City of Jackson, MS - *Drinking Water*

Drinking Water Systems

- ▶ Jackson operates two water systems (one surface water, one ground water)
- ▶ Surface water system - serves 156,959 customers
 - OB Curtis WTP
 - Constructed in the late 1980's and expanded in 1997
 - Capacity - about 50 million gallons per day
 - Conventional system and a membrane filtration treatment system
 - J.H. Fewell WTP
 - over 100 years old
 - Conventional system
- ▶ Ground Water System - serves 16,555 customers
 - Far southwestern part of the city
 - Six active wells and three storage tanks
 - Removed from service in 2014, however, brought back online due to distribution systems issues in 2015.

City of Jackson, MS - *Drinking Water*

SDWA Enforcement

► **Actions**

- 1431 Emergency Order issued March 27, 2020
- 1414 Administrative Order on Consent issued July 1, 2021
- Notices of Noncompliance: May 2020, April 2021, January 2022

► **Work with City has focused on**

- Increased EPA oversight and technical support
- Financial support and resources
- Completing work under the 1414 AOC including the Comprehensive Equipment Repair Plan
- Maintaining City's ability to ensure public health protection and provide alternative water through 1431

City of Jackson, MS - *Drinking Water*

SDWA Enforcement

► **Progress to Date**

- City Council passed pay raise for drinking water operators
- Lead and Copper Rule:
 - Materials evaluation completed
 - JH Fewell Corrosion Control Treatment Plan approved, and implementation started
- OB Curtis: Scope of Work approved to repair filters, membrane trains and Clari-Trak system
- For both plants: Monitoring equipment, including turbidimeters, are consistently operational

► **Major Work Remaining**

- Repair electrical panel and Clari-Trak System at OB Curtis
- Complete corrosion control implementation at Fewell
- Filter repair for both plants (will take years)
- Approve Asset Management Plan

City of Jackson, MS - *Drinking Water*

SDWA Enforcement

► Challenges

- (b)(5) [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]

City of Jackson, MS - *Drinking Water*

OPTIONS

- ▶ Notice of Noncompliance for failure to timely fix electrical panel ☒ *Completed*
- ▶ Provide assistance to expedite delivery of parts for electrical panel ☐ *In progress*
- ▶ Amend AOC to include 1) implement an improved governance structure to respond to future emergencies and efficiently conduct repair projects; and 2) hiring operators and maintenance staff
- ▶ (b)(5) [REDACTED]
 - [REDACTED]
 - [REDACTED]
 - [REDACTED]
 - [REDACTED]

City of Jackson, MS - State Revolving Fund (SRF)

Drinking Water and Clean Water Active SRF Loans for the City of Jackson, MS

Borrower Name	State Tracking Number	Status	Funding Amount	Agreement Date	Grant Authority
City of Jackson	C280738-03	Active	\$31,683,000.00	09/30/2021	Clean Water
City of Jackson	C280838-04	Active	\$30,000,000.00	01/13/2020	Clean Water
City of Jackson	DWI-L250008-03	Active	\$27,953,300.00	09/30/2021	Drinking Water
City of Jackson	DWI-L250008-02	Active	\$12,903,093.00	09/30/2019	Drinking Water
City of Jackson	WIIN Small, underserved and Disadvantaged Grant	Active	\$454,000.00	09/14/2021	2016 Water Infrastructure Improvements for the Nation Act (WIIN Act)
Total			\$102,993,393		

- The State of Mississippi Local Governments and Rural Water Systems Improvements Board (Board) is the state oversight entity for the **Mississippi State Department of Health (MSDH)** which administers the Drinking Water State Revolving Fund (DWSRF) Loan Program.
- The **Mississippi Department of Environmental Quality (MSDEQ)** administers the Clean Water State Revolving Fund (CWSRF) - called the Water Pollution Control Revolving Loan Fund (WPCRLF) Program.

City of Jackson, MS - *DW Technical Assistance*

- ▶ **ARPA funding for EJ and Drinking Water Technical Assistance**
 - ▶ \$150K award to University of North Carolina Environmental Finance Center for:
 - ▶ Financial assessment of utility
 - ▶ Considerations on alternative governance options
 - ▶ \$100K simplified competition being drafted for onsite operator training

- ▶ **\$80K to support distribution system evaluation (Area-Wide Optimization Program)**
 - ▶ Initial site visit tentatively scheduled for March 1st-3rd
 - ▶ Purpose: to develop best practice recommendations for management and operation of the distribution system

- ▶ **Coordination with EPA Water Security Division on expediting delivery of control panel part for High Service Pumps**
 - ▶ To increase ability to push treated water into South Jackson to address water outages
 - ▶ Exploring all options to elevate the critical infrastructure need to General Electric

City of Jackson, MS

► Communications Considerations